

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

**HAITIAN EVANGELICAL CLERGY  
ASSOCIATION; SERVICE EMPLOYEES  
INTERNATIONAL UNION – LOCAL  
32BJ; SABINA BADIO FLORIAL;  
YOUDELAINE DORCIN; ROBERT  
JEAN ALIX ERINAC; RACHELLE  
GUIRAND; DIEU YOLNICK JEUNE  
CADET; AUDOINE AMAZAN; GERALD  
MICHAUD; NADEGE JOSEPH  
MICHAUD; and MARIE WILDRIGUE  
ERINAC MIOT,**

*Plaintiffs,*

v.

**DONALD J. TRUMP, President of the  
United States of America; UNITED  
STATES OF AMERICA; THE  
DEPARTMENT OF HOMELAND  
SECURITY; and KRISTI NOEM,  
Secretary of Homeland Security,**

*Defendants.*

Case No. 1:25-cv-01464-BMC

**NOTICE OF MOTION FOR  
POSTPONEMENT OF AGENCY  
ACTION UNDER 5 U.S.C. § 705**

**ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that on April 16, 2025, at 9:30 a.m., or as soon thereafter as the matter may be heard, at 225 Cadman Plaza East, Brooklyn, New York 11201, Plaintiffs will, pursuant to 5 U.S.C. § 705, move this Court, the Hon. Brian M. Cogan, U.S.D.J., for postponement of the effective date of the Secretary of Homeland Security's February 24, 2025, "partial vacatur" of Haiti's Temporary Protected Status designation pending final resolution of this case on the merits. In support their motion, Plaintiffs are simultaneously submitting a memorandum of law dated April 15, 2025.

Dated: April 15, 2025

Respectfully submitted,

/s/ Andrew Tauber  
Andrew Tauber

Ira J. Kurzban

Andrew E. Tauber

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\*PHV application forthcoming

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